

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

RENEE ZINSKY,

CIVIL ACTION

Plaintiff,

No. 2:22-cv-547

v.

Judge Horan

MICHAEL RUSSIN, RUSSIN  
FINANCIAL, RUSSIN GROUP, SIMON  
ARIAS, III, ARIAS AGENCIES, S.A.  
HOLDING AMERICAN INCOME LIFE  
INSURANCE COMPANY,

Defendant.

JURY TRIAL DEMANDED

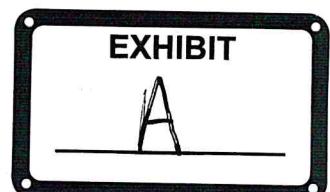
**PLAINTIFF'S INITIAL DISCLOSURES**

Plaintiff Renee Zinsky, through her undersigned counsel, makes her initial disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedures and the Court's scheduling order.

**I. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION**

**A. Liability**

1. Renee Zinsky 5023 Sutton Place Wexford, PA 15090	Plaintiff has information concerning the allegations in her complaint.
2. Malorie Fry 5023 Sutton Place Wexford, PA 15090	Ms. Fry has information concerning the allegations in Plaintiff's complaint.
3. Michael Russin 11 Noble Lane Windham, ME 04062	Mr. Russin is believed to have information concerning the allegations in Plaintiff's complaint.
4. Geneva Russin 11 Noble Lane Windham, ME 04062	Mrs. Russin is believed to have information concerning Defendant, Michael Russin's inappropriate behavior toward Plaintiff and other females.



5. Simon Arias  
103 Indian Meadow Drive  
Mars, PA 16046  
Mr. Arias is believed to have information regarding Defendant Michael Russin's hiring/employment with AIL/Arias Agencies, termination of Mr. Russin, Plaintiff's reports of fraud, sexual harassment and sexual assault, Defendants' response(s) thereto, Defendants' policies and procedures regarding same.

4. Chrissy Vansuch  
14612 Mirabelle Vista Circle  
Tampa, FL 33626  
813-475-4839  
Ms. Vansuch is believed to have information regarding Plaintiff's reports of fraud, sexual harassment/sexual assault, Defendants' response(s) thereto, Defendants' policies and procedures regarding same.

5. Natalie D'Achilles  
150 Lake Drive  
Wexford, PA 15090  
724-612-3361  
Mrs. D'Achilles is believed to have information regarding Plaintiff's reports of fraud, sexual harassment/sexual assault, Defendants' response(s) thereto, Defendants' policies and procedures regarding same.

6. Katie McCabe  
150 Lake Drive  
Wexford, PA 15090  
412-848-6722  
Ms. McCabe is believed to have information regarding Plaintiff's reports of fraud, sexual harassment/sexual assault, Defendants' response(s) thereto, Defendants' policies and procedures regarding same.

7. Steven Greer  
1200 Wooded Acres  
Waco, TX 76710  
Mr. Greer is believed to have information regarding Mr. Russin's employment, Plaintiff's reports of fraud, sexual harassment/sexual assault, Defendants' policies and procedures regarding same.

8. David Zophin  
1200 Wooded Acres  
Waco, TX 76710  
Mr. Zophin is believed to have information regarding Mr. Russin's employment, Plaintiff's reports of fraud, sexual harassment/sexual assault, Defendants' policies and procedures regarding same.

9. Debbie Gamble  
1200 Wooded Acres  
Waco, TX 76710  
Ms. Gamble is believed to have information regarding Mr. Russin's employment, Plaintiff's reports of fraud, sexual harassment/sexual assault, Defendants' response(s) thereto, Defendants' policies and procedures regarding same.